

EXHIBIT "A"

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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)

In re:

CIRCUIT CITY STORES, INC., *et al.*
Debtors.

Case No. 08-35653-KRH
Jointly Administered
Chapter 11 Proceedings

**DECLARATION OF WILLIAM F. BAKER IN SUPPORT OF SANGERTOWN SQUARE,
L.L.C.'S RESPONSE TO THE LIQUIDATING TRUST'S FOURTH OMNIBUS
OBJECTION TO LANDLORD CLAIMS (REDUCTION OF CERTAIN PARTIALLY
INVALID CLAIMS AND DISALLOWANCE OF CERTAIN INVALID CLAIMS)**

STATE OF NEW YORK)
)SS:
COUNTY OF ONONDAGA)

William F. Baker, being duly sworn, deposes and says:

1. I am Assistant General Counsel of Pyramid Management Group, LLC (the "Management Company"). The Management Company is the managing agent of Sangertown Square, L.L.C. (the "Landlord") which is the owner of a shopping center located at Sangertown Square Mall, New Hartford, New York (the "Center").

2. I have personal knowledge of the facts set forth in this Declaration and I may be contacted at: Pyramid Management Group, LLC, 4 Clinton Square, Syracuse, New York 13202, (315) 422-7000.

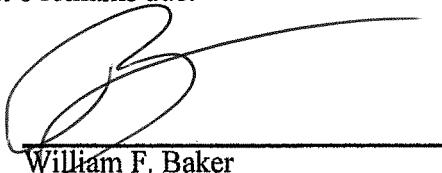
3. The Landlord was a party to a lease (the "Lease") with Circuit City Stores, Inc. (the "Debtor") of premises (the "Premises) at the Center.

4. In the regular course of my employment by the Management Company, I review rent and other charges billed to the Landlord's tenants.

5. The total amount reserved under the Lease from March 11, 2009 until the end of the Lease term is \$3,353,499.89. An itemization of this calculation is attached to this Declaration as Schedule 1.

6. Fifteen percent of this rent reserved is \$503,024.98.

7. The Landlord's claim for \$503,024.98 remains due.



William F. Baker

Sworn to before me this
5 day of April, 2011

Sally A. O'Donnell
Notary Public
SALLY A. O'DONNELL
Notary Public, State of New York
Qualified in Onondaga County
Commission Expires March 30, 2014

SCHEDULE “1”

NET PRESENT VALUE
OF FUTURE PAYMENTS
3/11/2009

TENANT: MALL:	CIRCUIT CITY - MERCHANT #610104 Sangerstown
TERM:	10 YEARS 3 MONTHS
LCD:	1/1/09/98
SQ. FT.:	21,280
EXPIRATION:	01/31/19
NPV DATE:	03/11/09

YEAR	RATE <u>RENT</u>		9.00% <u>MALL CHG</u>		RATE <u>RENT</u>		6.00% <u>MALL CHG</u>		RATE <u>RENT</u>		0.00% <u>MALL CHG</u>	
2009	174,749.81	83,758.06	258,507.87	174,749.81	83,758.06	258,507.87	174,749.81	83,758.06	258,507.87	174,749.81	83,758.06	258,507.87
2010	216,689.76	104,826.96	321,516.72	216,689.76	104,826.96	321,516.72	216,689.76	104,826.96	321,516.72	216,689.76	104,826.96	321,516.72
2011	216,689.76	105,822.96	322,512.72	216,689.76	105,822.96	322,512.72	216,689.76	105,822.96	322,512.72	216,689.76	105,822.96	322,512.72
2012	216,689.76	106,848.84	323,538.60	216,689.76	106,848.84	323,538.60	216,689.76	106,848.84	323,538.60	216,689.76	106,848.84	323,538.60
2013	216,689.76	107,905.44	324,595.20	216,689.76	107,905.44	324,595.20	216,689.76	107,905.44	324,595.20	216,689.76	107,905.44	324,595.20
2014	241,518.85	108,993.72	350,512.57	241,518.85	108,993.72	350,512.57	241,518.85	108,993.72	350,512.57	241,518.85	108,993.72	350,512.57
2015	243,776.04	110,114.64	353,890.68	243,776.04	110,114.64	353,890.68	243,776.04	110,114.64	353,890.68	243,776.04	110,114.64	353,890.68
2016	243,776.04	111,269.28	355,045.32	243,776.04	111,269.28	355,045.32	243,776.04	111,269.28	355,045.32	243,776.04	111,269.28	355,045.32
2017	243,776.04	112,458.48	356,234.52	243,776.04	112,458.48	356,234.52	243,776.04	112,458.48	356,234.52	243,776.04	112,458.48	356,234.52
2018	243,776.04	113,683.44	357,459.48	243,776.04	113,683.44	357,459.48	243,776.04	113,683.44	357,459.48	243,776.04	113,683.44	357,459.48
2019	20,314.67	9,371.54	29,686.21	20,314.67	9,371.54	29,686.21	20,314.67	9,371.54	29,686.21	20,314.67	9,371.54	29,686.21
NPV	\$1,505,654.99	\$714,340.91	\$2,219,995.90	\$1,711,220.80	\$810,438.76	\$2,521,659.56	\$2,278,446.53	\$1,075,053.36	\$3,353,499.89			